

Exhibit B: Google's Proposal

1. Google will identify all Merchant Center accounts exactly matching the domains in Column A of the spreadsheet Plaintiffs provided on December 6, 2024 ("2024.12.06 Cengage v. Google - Domains Noticed through 2024.08.12 identifying WIS.xlsx") (the "Domain-Identified Merchants"). Google will also only agree to perform this exercise once and does not agree to run additional searches for domains uniquely identified in additional notices through "the present," months after this lawsuit was filed.
2. Google will produce information, for all Domain-Identified Merchants, responsive to the reasonable scope of Plaintiffs' requests for discovery related to what Plaintiffs refer to as "Infringing Merchants" (i.e., "any Shopping Ads Merchant listed or otherwise identified in a Plaintiff Infringement Notice"), the precise scope of which will be subject to Google's other objections and limitations and the Parties' ongoing negotiations regarding, *e.g.*, Plaintiffs' RFPs Nos. 25–27, 29, 31, 33–38, and 44.
3. Google will further identify the email account identifiers associated with the Domain-Identified Merchants, and search for and identify any additional merchant accounts using the same email account identifiers (the "Email-Connected Merchant Accounts").
4. Google will further produce current Merchant Center account information associated with the Email-Connected Merchant Accounts, sufficient to identify the merchant name, website homepage, account creation date, and account suspension date, to the extent such data exists and is maintained by Google in the ordinary course of business. Google will not search for historical data or historical revisions to such data in connection with this proposal.